

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BANK OF AMERICA, N.A.,

Plaintiff,

V.

**RHETT CAVIEL, MORGAN L. JACKSON, §
HEWEN P. HUMPHREY, III, MARTHA §
HUMPHREY McQUEEN, HOMER §
HUMPHREY, LEO C. HUMPHREY, §
FRANK HUMPHREY, BARABARA J. §
HUMPHREY ARMSTEAD, and THE §
UNKNOWN HEIRS AT LAW OF §
ANTHONY R. HUMPHREY, DECEASED, §**

Defendants.

Civil Action No. 4:22-cv-02747

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF

Mark D. Cronenwett (“Cronenwett”), counsel of record for Plaintiff Bank of America, N.A. (“Plaintiff”), moves the Court to allow his withdrawal from this cause and in support thereof would respectfully shows the Court as follows:

I.

On May 17, 2024, Cronenwett left the law firm of Mackie Wolf Zientz & Mann, PC, and therefore requests that he be withdrawn as counsel for Plaintiff in this cause. Plaintiff will suffer no prejudice by this withdrawal as Plaintiff is currently and will remain represented by Nicholas M. Frame of the law firm of Mackie Wolf Zientz & Mann, P.C., 14160 N. Dallas Parkway, Suite 900, Dallas, Texas 75254, 713.730.3217, 214.635.2686 fax. This withdrawal of counsel is not made for reasons of delay, but so that justice may be done. This withdrawal of counsel is unopposed by Counsel for Rhett Caviel, the only defendant who has appeared in this case.

WHEREFORE, PREMISES CONSIDERED, Cronenwett moves the Court for an order permitting him to withdraw as its counsel and for such other and further relief to which he may be justly entitled.

Respectfully submitted,

By: /s/ Mark D. Cronenwett
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Withdrawing Attorney for Plaintiff

CERTIFICATE OF CONFERENCE

The undersigned counsel conferred with Marcella A. Hagger, counsel for Defendant Rhett Caviel, and she is unopposed to this motion.

/s/ Mark D. Cronenwett
MARK. D. CRONENWETT

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2024, a true and correct copy of the foregoing was served in the manner described below on the following:

VIA ECF:

Marcella A. Hagger
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/s/ Mark D. Cronenwett
MARK D. CRONENWETT